

**WACHTELL, LIPTON, ROSEN & KATZ**

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Attorneys for Defendant J.P. Morgan Whitefriars Inc.

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:	:	Chapter 11 Case
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	:	Case No. 09-50026 (REG)
Debtors.	:	(Jointly Administered)
MOTORS LIQUIDATION COMPANY AVOIDANCE	:	Adversary Proceeding
ACTION TRUST, by and through the Wilmington Trust	:	Case No. 09-00504 (REG)
Company, solely in its capacity as Trust Administrator	:	
and Trustee,	:	
Plaintiff,	:	
vs.	:	
JPMORGAN CHASE BANK, N.A., individually and as	:	
Administrative Agent for various lenders party to the	:	
Term Loan Agreement described herein, <i>et al.</i> ,	:	
Defendants.	:	

**RULE 7007.1 STATEMENT**

Pursuant to Rule 7007.1 of the Federal Rules of Bankruptcy and to enable Bankruptcy Judges of the Court to evaluate possible disqualification or recusal, the undersigned counsel for J.P. Morgan Whitefriars Inc. (“Whitefriars”), a private non-governmental party, by its attorneys Kelley Drye & Warren LLP and Wachtell, Lipton, Rosen & Katz, certifies that

Whitefriars is a wholly-owned subsidiary of J.P. Morgan Overseas Capital Corporation, a privately held company, which is a wholly-owned subsidiary of J.P. Morgan International Finance Limited, a privately held company, which is a wholly-owned subsidiary of Bank One International Holdings Corporation, a privately held company, which is a wholly-owned subsidiary of J.P. Morgan International, Inc. , a privately held company, which is a wholly-owned subsidiary of JPMorgan Chase Bank, N.A., a privately held company, which is a wholly-owned subsidiary of JPMorgan Chase & Co., a publicly held corporation, and that no other person or entity owns 10% or more of Whitefriars' stock.

Dated: New York, New York  
November 16, 2015

Respectfully submitted,

KELLEY DRYE & WARREN LLP

By: /s/ John M. Callagy

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-and-

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